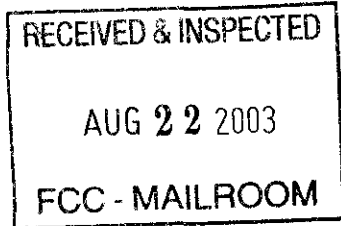


DOCKET FILE COPY ORIGINAL



August 21, 2003

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capiatol Heights, MD 20743

Regarding: MB Docket No. 03-149
Grapeland, TX - Counterproposal

Dear Ms. Dortch:

I have enclosed an original and 4 copies of my counterproposal to MB Docket No. 03-149, Grapeland, Texas. Please call at the number below if you have any questions.

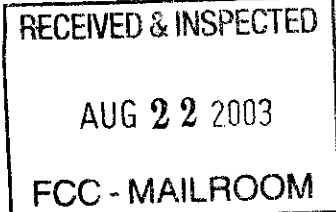
Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read "Joe Garcia".

Joe Garcia
VP Elgin FM Limited Partnership
7524 North Lamar, Suite 200
Austin, Texas 78752
(512) 453-1491 (tele)
(512) 458-0700 (fax)

MB Docket 03-149
014

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**



In the Matter of)	
)	
Amendment of Section 73.202(b))	MB Docket No. <u>03-149</u>
Table of Allotments)	RM-10725
FM Broadcast Stations)	
(Grapeland, Texas)	

To: John Karousos, Assistant Chief
Audio Division of the
Media Bureau

COUNTERPROPOSAL

Elgin FM Limited Partnership ("Elgin"), the license of station KKLB/ Elgin, Texas, hereby submits this counterproposal to the **Notice of Proposed Rule Making**, DA 03-2092, (rel. July 1, 2003) ("**NPRM**") in the above caption proceeding.

In the NPRM, the petitioner proposed the allotment of Channel 280A to Grapeland, Texas as the second service to that community. Conversely, Elgin, in the instant Counterproposal submits a plan which will provide for a first service to the city of Calvert, Texas and the elimination of three incidences of short spacing.

DISCUSSION

Elgin proposes to eliminate the short spacing between KKLB and KBEY/ Burnet, Texas by substituting Channel 280A for Channel 223A at the current reference coordinates of KBEY. Additionally, Elgin proposes to substitute Channel 280C3 for Channel 280C2 for KXCS at Cameron and reallocate the channel to Calvert, Texas as its first local service. Cameron will retain local service. Also, Channel 252A will need to be substituted for the vacant Channel 284A at Junction, Texas. Additionally, the vacant Channel 281C2 at Mason, Texas will need to relocate its reference coordinates 18.7 km west. Elgin notes that a reclassification request for Station KEYI-FM San Marcos, Texas has already been triggered by the Petition for Channel 291A at Center Point, Texas, filed on June 30, 2003, applications ID # 672033. This trigger is already reflected in the FCC engineering database. Because of the height restrictions of Bergstrom International Airport which services the Austin metro, KEYI should be unable to achieve the 451 meters required in order to keep its class C status. Therefore, the reclassification should be merely a ministerial act.

The public interest will benefit from the provision of first local service to Calvert, Texas and the elimination of three incidences of short spacing, KKLB to KBEY, KXCS to KRBE and KXCS to KWOW.

I. PRELIMINARY MATTERS

The following table summarizes the changes requested in this Counterproposal:

<u>Community</u>	<u>Channel Existing</u>	<u>Channel Proposed</u>
Elgin	223A	223A ¹
Burnet	223A	280A
Cameron	280C2	-----
Calvert	-----	280C3
Mason	281C2	281C2 ²
Junction	284A	252A

Elgin has entered into an agreement with Equicom Inc., the licensee of Station KXCS, Cameron, Texas and will reimburse them for their reasonable expenses in changing channel and transmitter site in accordance with **Circleville, Ohio**, 8 FCC 2d 159 (1967). Equicom has furnished a statement consenting to the proposed changes.. (See, Attachment A) If the counterproposal is granted, Elgin will file an application to move the transmitter site of KKL B 13.29 km west and Equicom will file an application to modify the license of KXKS to specify operation on Channel 280C3 at Calvert, Texas.

Elgin hereby states that it will also reimburse the licensee of Station KBEY, Burnet, Texas for their reasonable expenses in changing channels from 223A to 280A. Munbilla Broadcasting Properties Ltd., the licensee of station KBEY, has not provided a consent statement for the proposed change in channel. Elgin respectfully requests that the Commission issue an Order to Show Cause to effectuate the channel change. Accordingly, this proposal complies with the Commission's policy in Columbus, Nebraska, 59 RR 2d 1185 (1986).

II. CONFLICT WITH THE NPRM

This proposal, which would result in the first service allotment of Channel 280C3 to Calvert, Texas, conflicts with the NPRM proposal to allot the second service to Grapeland, Texas, Channel 280A. (See, Attachment B) Accordingly, it is properly considered in this proceeding. The Commission compares conflicting proposals under the criteria set forth in **Revision of FM Assignment Policies and Procedures**, 90 F.C.C.2d 88 (1982). In this case, this counterproposal is clearly preferred over the proposal set forth in the NPRM since this counterproposal would provide a first local service at Calvert, Texas (priority 3), while the NPRM would add a second FM allotment

¹ Elgin is proposing to move KKL B 13.29 km West and still provide a 3.16 mv signal to the city of Elgin at: 30 16 12/ 97 28 00.

² The new reference coordinates for Channel 281C2, the vacant allotment at Mason, Texas, are: 30 45 10/ 99 25 31.

at Grapeland (priority 4). Also, the Counterproposal provides additional public interest benefits by the elimination of three incidences of short spacing.

III. COMPLIANCE WITH THE COMMISSION'S RULES

A. STATION KKLB, ELGIN, TEXAS

In order to eliminate the short spacing between KKLB and KBEY and for KKLB to move 13.29 km West to improve its population coverage, Channel 280A must be substituted for Channel 223A at the current reference coordinates of Station KBEY. KKLB can moved to the proposed site and still provide a 3.16 mv signal over its city of license, Elgin, provided the change is made at Burnet, Texas.

Attached hereto is a channel study confirming that KKLB can move 13.29 km west, consistent with the FCC's FM separation rules, provided that KBEY is moved to another channel at its current transmitter site. (See, Attachment C)

New reference coordinates for KKLB are:

30 16 12 N
97 28 00 W

B. STATION KBEY, BURNET, TEXAS

In order for KKLB to move 13.29 km west and to eliminate the short spacing between KKLB and KBEY, Channel 280A must be substituted for Channel 223A at the current reference coordinates of Station KBEY, provided changes are made at Cameron and Mason. Elgin requests that the Commission immediately issue an Order to Show Cause to Munbilla Broadcasting Properties Ltd., the licensee of KBEY, to change its channel. Elgin reiterates that is will reimburse the licensee in accordance with *Circleville, Ohio, supra*.

Attached hereto is a channel study confirming that Channel 280A can be substituted for Channel 223A consistent with the FCC's FM separation rules, provided changes are made at Cameron and Mason. (See, Attachment D)

Reference coordinates for Channel 280A at Burnet, Texas are:

30 44 29 N
98 19 05 W

C. STATION KXCS, CAMERON TO CALVERT, TEXAS

In order to substitute Channel 280A at Burnet, Channel 280C3 must be substituted for Channel 280C2 at Cameron and reallocated to Calvert, Texas. Elgin has entered into an agreement with Equicom Inc., the licensee of KXCS, and will reimburse them for their reasonable expenses in changing channel and transmitter site.

1. Technical Analysis

Channel 280C3 can be allotted to Calvert, Texas consistent with Section 73.207 of the Commission's Rules. A 3.16 mv signal can be provided to Calvert from the proposed reference point.

Attached hereto is a channel study confirming that KXCS Channel 280C2 Cameron, Texas can be reclassified to a class C3 and re-licensed to Calvert, Texas, consistent with the FCC's FM separation rules. (See, Attachment B)

Reference Coordinates for Channel 280C3 at Calvert, Texas are:

30 53 15 N
96 31 54 W

2. Change in Community of License

In Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("*Community of License*"), the Commission stated that in order to grant a change in community of license: (1) the proposed use of the channel must be mutually exclusive with its current use; (2) the existing community of license must retain local service; and (3) the proposed arrangement of allotments must be preferred over the existing arrangement under the commission's allotment priorities. The proposed change in community of license of KXCS from Cameron to Calvert satisfies these prerequisites.

The community of Calvert, Texas, is a community deserving of a first local service. Calvert is a rural community located in Robertson County. The Town of Calvert is listed in the U.S. Census 2000 with a population of 1,426. The United State Postal Service zip code designation for Calvert is 77837. The town was chartered in 1871. Its Town government functions independently of any other governmental units.

The city government of Calvert is General Law Type A and provides police and fire services. The mayor is Briscoe Cain and the mayor pro tem is Alma Louise Newton. The city secretary is Bronwyn McGlothlin, city attorney is Bryan F. Russ, director of utilities is Michael Heusarling and the fire chief is Keith Pettit.

Calvert businesses include a wide variety of companies, a number of which have "Calvert" in their names, such as the Calvert Hotel, Calvert Foundry, Calvert Commission Company, Calvert Hotel & Smith Guest Haus, Calvert Inn, Calvert Rose, Calvert Florist, Calvert Food Mart, Calvert Tribune, Calvert Nursing Home, Calvert Inn Gourmet Bed & Breakfast and the Calvert Hotel Salon.

Calvert is home to a number of houses of worship, such as Bethel Baptist, Chapel Hill United Methodist, First Baptist, First Presbyterian, La Mission Bautista, Mt. Olive Baptist, Sneed Memorial United Methodist, St. Mary's Catholic Mission and United Pentecostal Church, to name a few. The Calvert Independent School District provides public school education to the children of Calvert.

The proposed Channel 280C3 at Calvert is mutually exclusive with Channel 280C2 at Cameron. And Cameron will retain local service from Stations KTXZ 94.3 FM and KMIL 1330 AM.

Calvert is located entirely outside the Bryan/ College Station Urbanized Area and only about 5% of the 3.16 mv signal of Channel 280C3 at Calvert would cover the Bryan/College Station Urbanized Area.

D. VACANT CHANNEL 281C2, MASON, TEXAS

In order to substitute Channel 280A at Burnet, the vacant Channel 281C2 at Mason will need to relocate its reference coordinates 18.7 km west. The vacant Channel 281C2 can be relocated 18.7 km West in compliance with the Commission's spacing rules and still provide a 3.16 mv signal over the city of Mason, provided the change is made at Junction.

Attached hereto is a channel study confirming that the reference coordinates for the vacant allotment for Channel 281C2 at Mason can be moved 18.7 km West consistent with the FCC's FM separation rules, provided the change is made at Junction, Texas. (See, Attachment E)

New Reference coordinates for Channel 281C2 at Mason, Texas are:

30 45 10 N
99 25 31 W

E. VACANT CHANNEL 284A, JUNCTION, TEXAS

In order to relocate the reference coordinates of the vacant Channel 281C2 at Mason, 18.7 kilometers West, Channel 252A must be substituted for the vacant Channel 284A at Junction.

Attached hereto is a channel study confirming that Channel 252A can be substituted for the vacant allotment Channel 284A at Junction, Texas consistent with the FCC's FM separation rules. (See, Attachment F)

Reference coordinates for Channel 252A at Junction, Texas are:

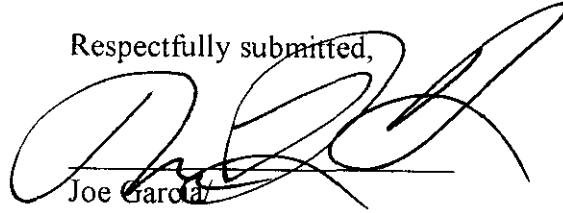
30 29 00 N
99 45 29 W

IV. CONCLUSION

Grant of the Counterproposal is in the public interest because Calvert, Texas will receive a first local service and the proposal will result in the elimination of three incidences of short spacing and therefore should be favored over the proposal set forth in the NPRM for a second local service at Grapeland, Texas. Accordingly, the Commission should grant the Counterproposal.

The factual information provided in the Counterproposal is correct and true to the best of my knowledge.

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read 'Joe Garcia', is written over a horizontal line.

Joe Garcia
VP Elgin FM Limited Partnership
7524 North Lamar, Suite 200
Austin, Texas 78752
(512) 453-1491 (tele)
(512) 458-0700 (fax)

August 21, 2003

Attachment A

(Equicom consent statement supporting the counterproposal)

**Station KXCS
Cameron, Texas**

Equicom Inc. ("Equicom"), licensee of Station KXCS, Cameron, Texas, hereby supports the counterproposal which proposes to reclassify KXCS to a C3 and re-license it to Calvert, Texas. Equicom understands that this statement may be used in a filing with the Commission and hereby authorizes its use for that purpose.

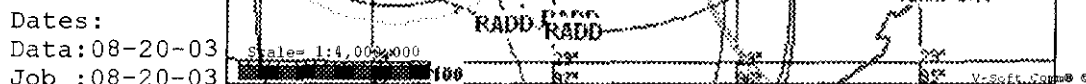
I verify that this statement is true, complete and correct to the best of my knowledge and belief and is made in good faith.

Equicom Inc.

By: RB Hale

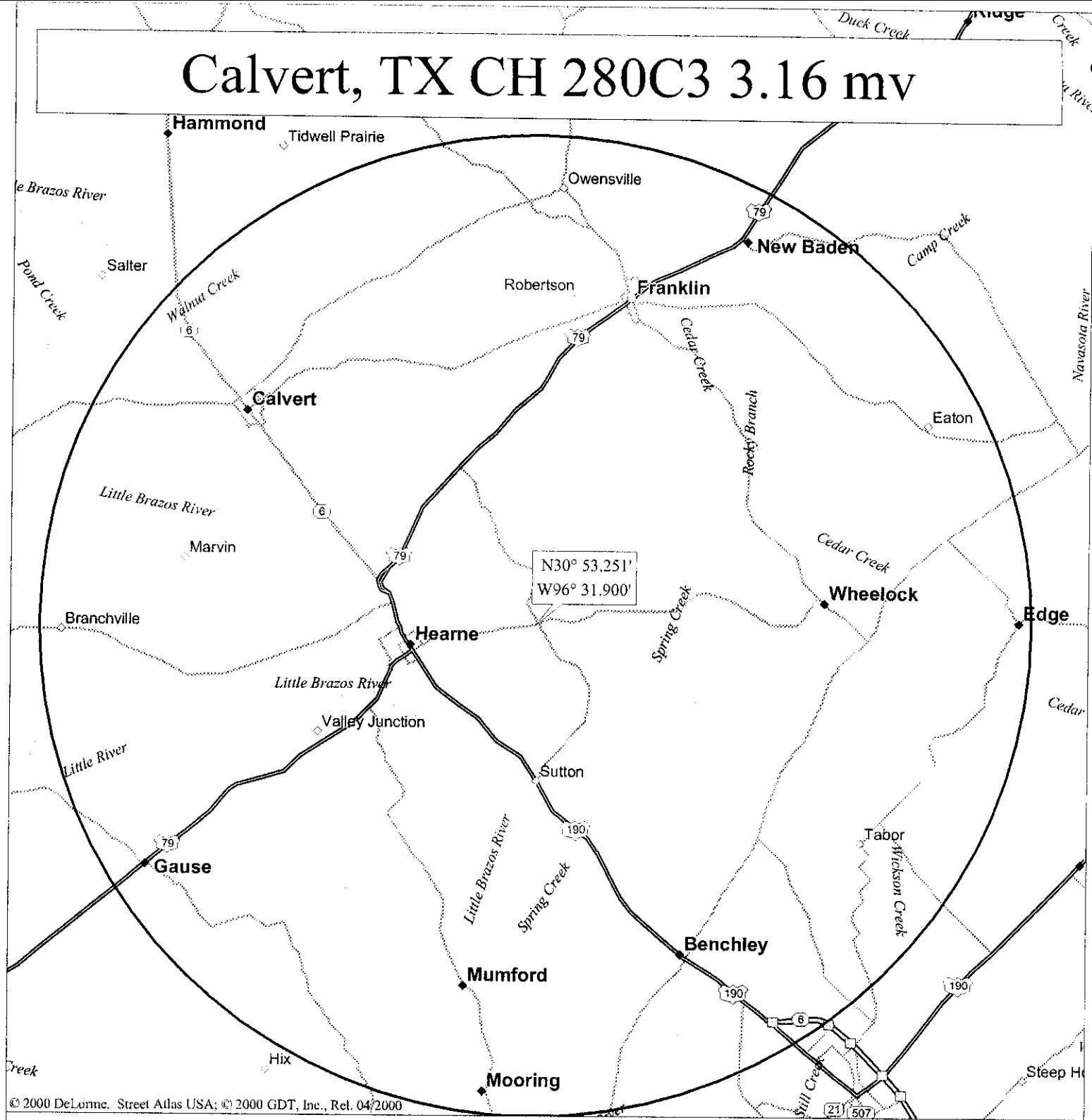
Its: President/CEO

Attachment B
(Channel Study for Channel 280C3/ Calvert, Texas)



Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
KXCS	280C2	LIC-Z	Cameron	TX	33.65	240.3	177.0	-143.35
RADD	280A	ADD	Grapeland	TX	131.93	56.0	142.0	-10.07
KRBE	281C	LIC	Houston	TX	175.51	145.8	176.0	-0.49
KWOW	281C2	LIC N	Clifton	TX	120.31	321.7	117.0	3.31
KVST	279C3	LIC	Willis	TX	107.62	116.7	99.0	8.62
KVILEM	279C	LIC	Highland Park-da	TX	193.10	347.8	176.0	17.10
ALLO.V	278A	VAC	Centerville	TX	67.00	44.7	42.0	25.00
KVST.C	279C	CP	La Porte	TX	211.88	115.7	176.0	35.88
KQBT	282C2	LIC N	Taylor	TX	94.33	237.9	56.0	38.33
ALLO.R	279C	RSV	La Port	TX	218.20	117.3	176.0	42.20
KWBUFM	277A	LIC N	Waco	TX	86.96	315.2	42.0	44.96
RADD	280A	ADD	Yoakum	TX	189.88	199.1	142.0	47.88
RADD	280A	ADD	Yoakum	TX	195.88	197.8	142.0	53.88
RADD	280A	ADD	Goldthwaite	TX	202.14	290.0	142.0	60.14
KEYIFM	278C*	LIC	San Marcos	TX	159.70	234.4	96.0	63.70
RDEL	278C	DEL	San Marcos	TX	159.70	234.4	96.0	63.70
RDEL	278C	DEL	San Marcos	TX	159.70	234.4	96.0	63.70
RDEL	278C	DEL	San Marcos	TX	159.70	234.4	96.0	63.70
ALLO.V	282C3	VAC	Lovelady	TX	107.51	73.1	43.0	64.51
RADD	280A	ADD	Smiley	TX	206.87	208.0	142.0	64.87
RADD	278C0	ADD	San Marcos	TX	159.70	234.4	87.0	72.70
RADD	278C0	ADD	San Marcos	TX	159.70	234.4	87.0	72.70
RADD	278C0	ADD	San Marcos	TX	159.70	234.4	87.0	72.70
RADD	278C0	ADD	San Marcos	TX	159.70	234.4	87.0	72.70

Calvert, TX CH 280C3 3.16 mv



© 2000 DeLorme. Street Atlas USA; © 2000 GDT, Inc., Rel. 04/2000

Mag 11.00

Mon Aug 11 19:07 2003

Scale 1:250,000 (at center)

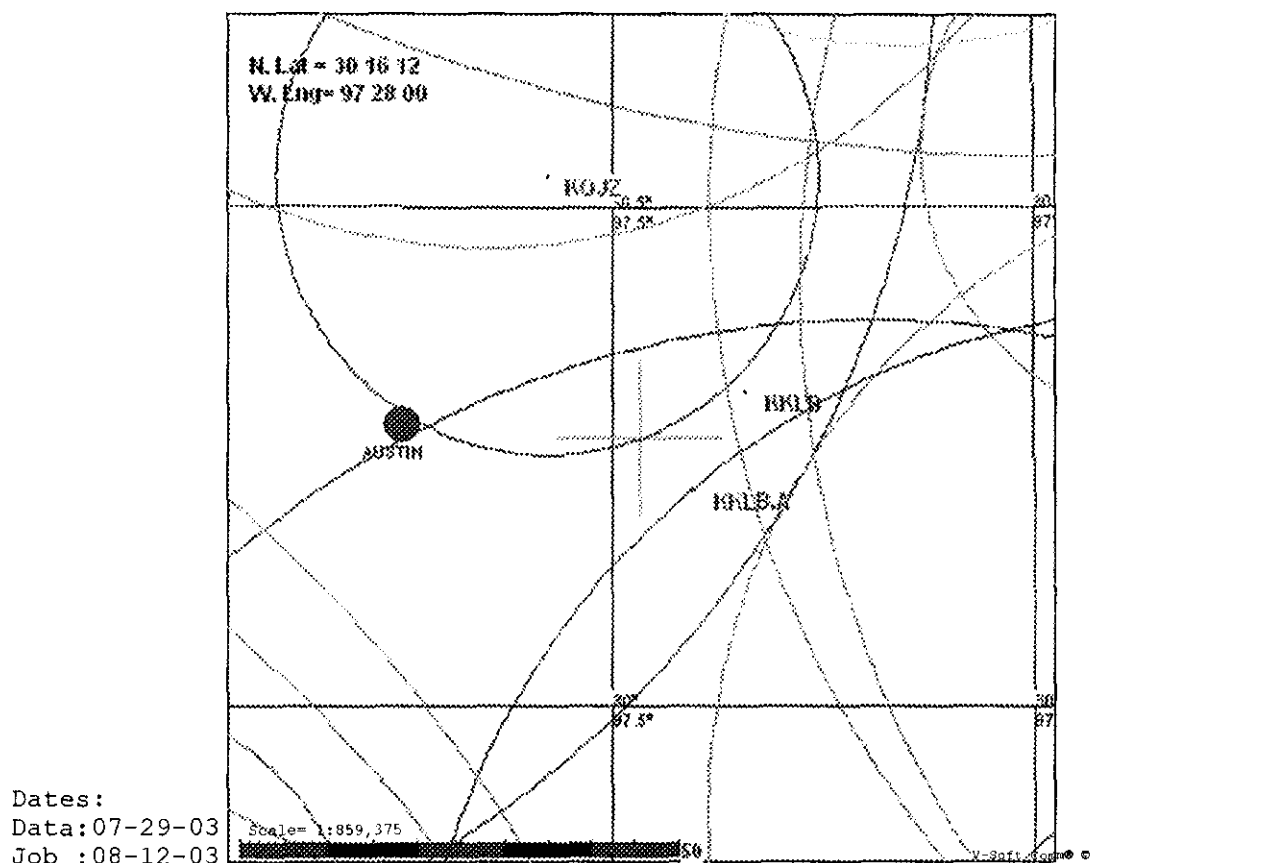
5 Miles

5 KM

- | | | | |
|--|---------------------------|--|--------------------|
| | Local Road | | Locale |
| | US Highway | | Land |
| | Interstate/Limited Access | | Water |
| | Major Connector | | River/Canal |
| | State Route | | Intermittent River |
| | Exit | | |
| | County Seat | | |
| | Small Town | | |

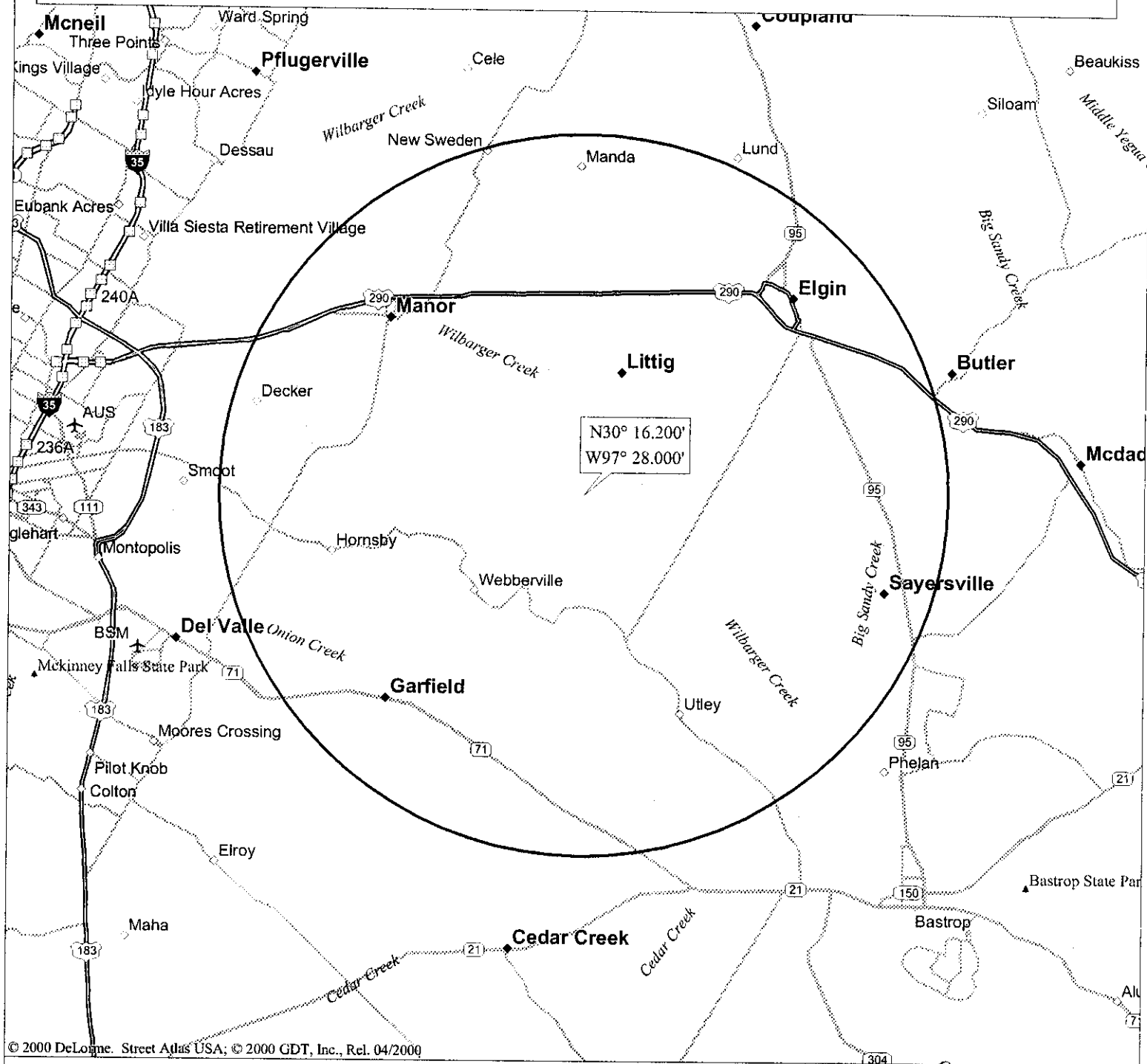
Attachment C

(Channel Study for KKL Channel 223A at new site 13.29 km west)

FM PROSP^(TM) LOCATE STUDY CH 223 A 92.5 MHz


Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
KKLB.A	223A	APP-Z	Elgin	TX	8.52	132.1	115.0	-106.48
KKLB	223A	LIC	Elgin	TX	13.29	67.0	115.0	-101.71
KBEY.A	223A	APP	Burnet	TX	97.01	302.9	115.0	-17.99
KBEY	223A	LIC	Burnet	TX	97.01	302.9	115.0	-17.99
RDEL	223A	DEL	Yoakum	TX	105.28	165.4	115.0	-9.72
RDEL	223A	DEL	Yoakum	TX	105.28	165.4	115.0	-9.72
KYKM	223A	LIC	Yoakum	TX	105.28	165.4	115.0	-9.72
KQJZ	221A	LIC	Hutto	TX	30.85	340.0	31.0	-0.15
RADD	222C3	ADD	Schulenburg	TX	97.31	140.1	89.0	8.31
KMBV.C	223A	CP N	Navasota	TX	125.83	77.9	115.0	10.83
RDEL	222A	DEL	New Ulm	TX	90.11	117.7	72.0	18.11
KNRG	222A	LIC	New Ulm	TX	90.11	117.7	72.0	18.11
KMBV	223A	LIC	Navasota	TX	134.45	82.7	115.0	19.45
KIIZFM	222A	LIC	Killeen	TX	94.67	349.4	72.0	22.67
KZPS	223C	LIC	Dallas	TX	261.41	10.3	226.0	35.41
KSJLFC	223C2	CP N	Devine	TX	204.04	229.2	166.0	38.04
980922	220A	APP	Caldwell	TX	70.81	63.1	31.0	39.81
KSJLFM	223C2	LIC	Devine	TX	213.72	226.0	166.0	47.72
RDEL	225C2	DEL	Marlin	TX	102.79	16.7	55.0	47.79
980908	220A	APP-D	Dripping Springs	TX	81.02	277.5	31.0	50.02
ALLO.V	220A	VAC	Gonzales	TX	84.99	179.2	31.0	53.99
KNBT.C	221A	CP -Z	New Braunfels	TX	86.89	226.5	31.0	55.89
KNBT	221A	LIC	New Braunfels	TX	86.95	226.6	31.0	55.95
KROM	225C1	LIC N	San Antonio	TX	134.62	215.0	75.0	59.62
KRNH	222C2	LIC-Z	Kerrville	TX	167.24	264.6	106.0	61.24
RADD	223C3	ADD	Markham	TX	206.22	139.0	142.0	64.22
980515	220C3	APP	College Station	TX	110.28	60.1	42.0	68.28
KLRK	225C2	LIC N	Marlin	TX	129.00	10.8	55.0	74.00

Elgin, TX KKLb CH 223A 3.16 mv



© 2000 DeLorme. Street Atlas USA; © 2000 GDT, Inc., Rel. 04/2000

Mag 11.00

Tue Aug 12 13:04 2003

Scale 1:250,000 (at center)

5 Miles

5 KM

- | | | | |
|--|-----------------------------|--|-----------------------|
| | Local Road | | Park/Reservation |
| | Interstate/Unlimited Access | | Locale |
| | US Highway | | Sched Service Airport |
| | Interstate/Limited Access | | Land |
| | Major Connector | | Water |
| | State Route | | River/Canal |
| | Exit | | Intermittent River |
| | Small Town | | |

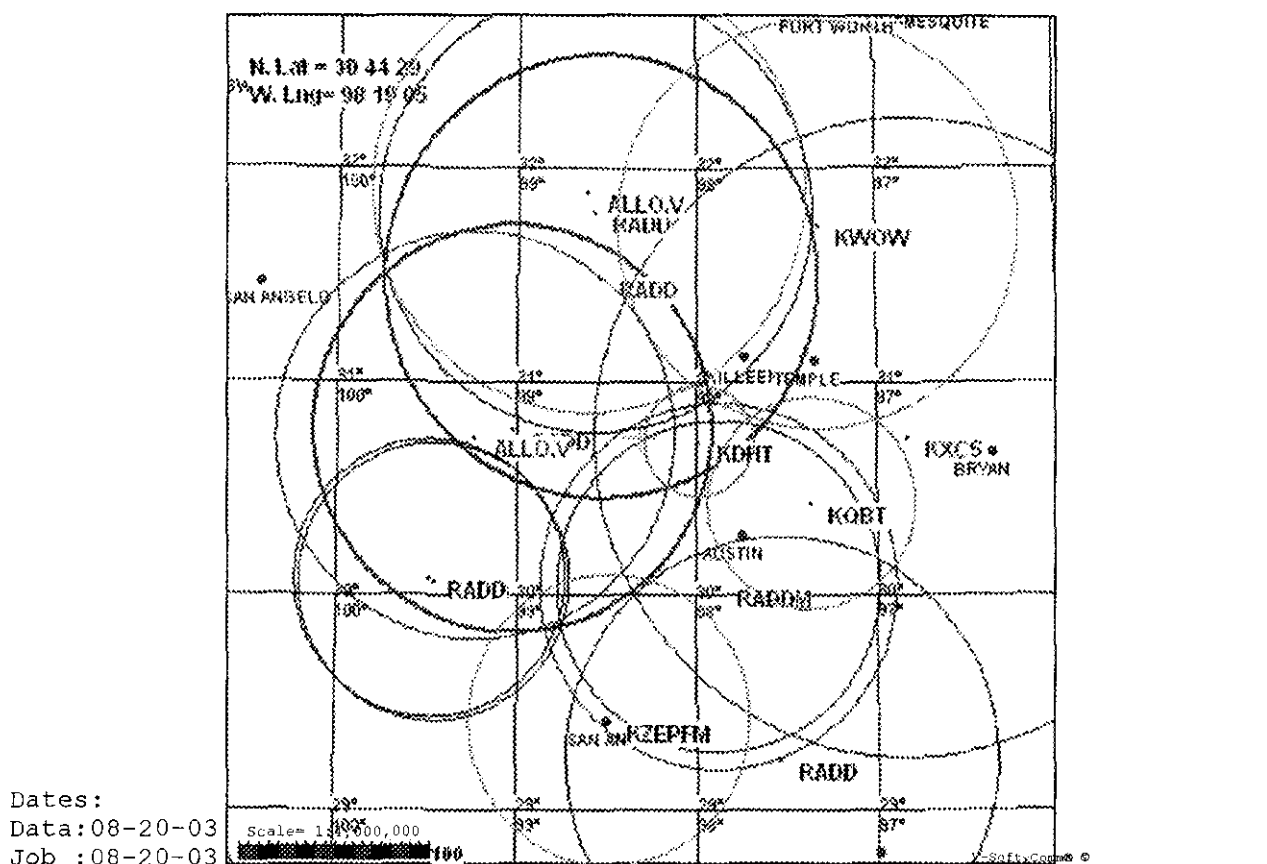
Attachment D

(Channel Study for Channel 280A/ Burnet, Texas)

Note: 280A/ Goldthwaite which shows being short -32.88 km is of no consequence as the dismissal for this channel was filed for on June 30, 2003.

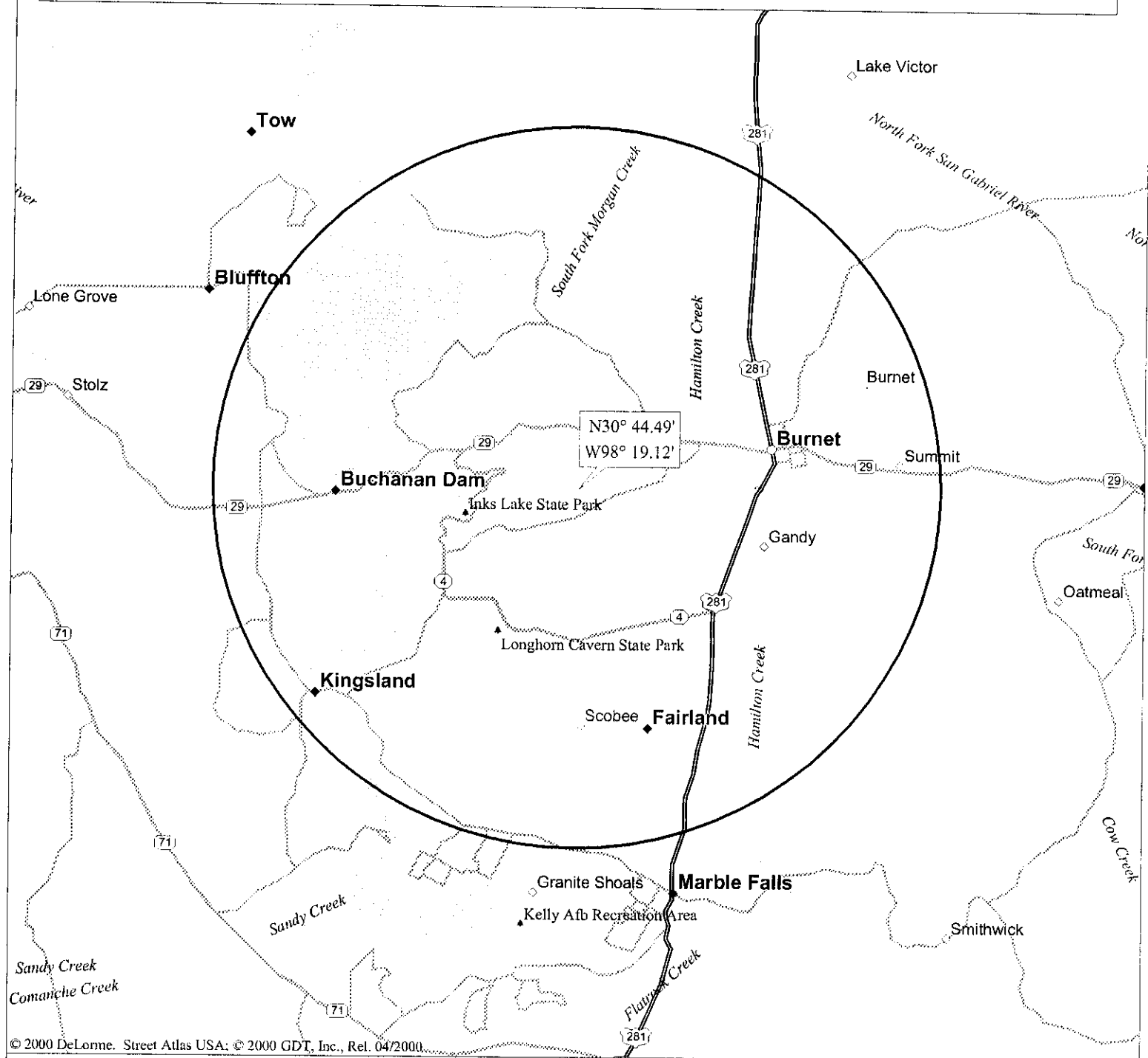
281C2/ Mason which shows being short -38.66 km is of no consequence as the FCC dismissed this channel on August 8, 2003.

FM PROSPTM LOCATE STUDY CH 280 A 103.9 MHz



Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
RADD	281C2	ADD	Mason	TX	67.34	274.1	106.0	-38.66
RADD	280A	ADD	Goldthwaite	TX	85.74	346.3	115.0	-29.26
KXCS	280C2	LIC-Z	Cameron	TX	141.81	89.8	166.0	-24.19
RDEL	281C2	DEL	Mason	TX	87.36	270.8	106.0	-18.64
ALLO.V	281C2	VAC	Mason	TX	87.36	270.8	106.0	-18.64
RDEL	278C	DEL	San Marcos	TX	87.91	151.4	95.0	-7.09
KEYIFM	278C*	LIC	San Marcos	TX	87.91	151.4	95.0	-7.09
RDEL	278C	DEL	San Marcos	TX	87.91	151.4	95.0	-7.09
RDEL	278C	DEL	San Marcos	TX	87.91	151.4	95.0	-7.09
RADD	278C0	ADD	San Marcos	TX	87.91	151.4	86.0	1.91
RADD	278C0	ADD	San Marcos	TX	87.91	151.4	86.0	1.91
RADD	278C0	ADD	San Marcos	TX	87.91	151.4	86.0	1.91
RADD	278C0	ADD	San Marcos	TX	87.91	151.4	86.0	1.91
KDHT	227C	LIC	Cedar Park	TX	31.49	93.0	29.0	2.49
RADD	280A	ADD	Comanche	TX	119.73	348.7	115.0	4.73
RDEL	280A	DEL	Comanche	TX	130.99	348.2	115.0	15.99
ALLO.V	280A	VAC	Comanche	TX	130.99	348.2	115.0	15.99
KWOW	281C2	LIC	N Clifton	TX	145.41	40.4	106.0	39.41
KQBT	282C2	LIC	N Taylor	TX	97.56	110.3	55.0	42.56
RADD	279A	ADD	Hunt	TX	132.45	235.8	72.0	60.45
RADD	279A	ADD	Hunt	TX	133.19	237.0	72.0	61.19
RADD	280A	ADD	Smiley	TX	182.96	155.5	115.0	67.96
KZEPFM	283C1	LIC	San Antonio	TX	147.45	186.3	75.0	72.45

Burnet, TX CH 280A 3.16 mv



© 2000 DeLonne. Street Atlas USA: © 2000 GDT, Inc., Rel. 04/2000.

Mag 11.00

Mon Aug 11 19:11 2003

Scale 1:250,000 (at center)

5 Miles

5 KM

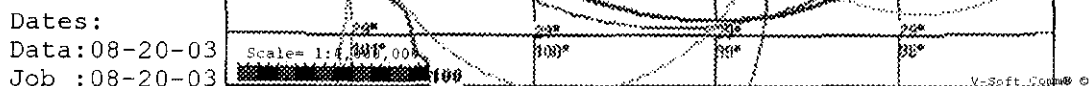
- | | | | |
|--|------------------|--|--------------------|
| | US Highway | | Water |
| | Major Connector | | River/Canal |
| | Slate Route | | Intermittent River |
| | County Seat | | |
| | Small Town | | |
| | Park/Reservation | | |
| | Locale | | |
| | Land | | |

Attachment E

(Channel Study for Channel 281C2/ Mason, Texas new site)

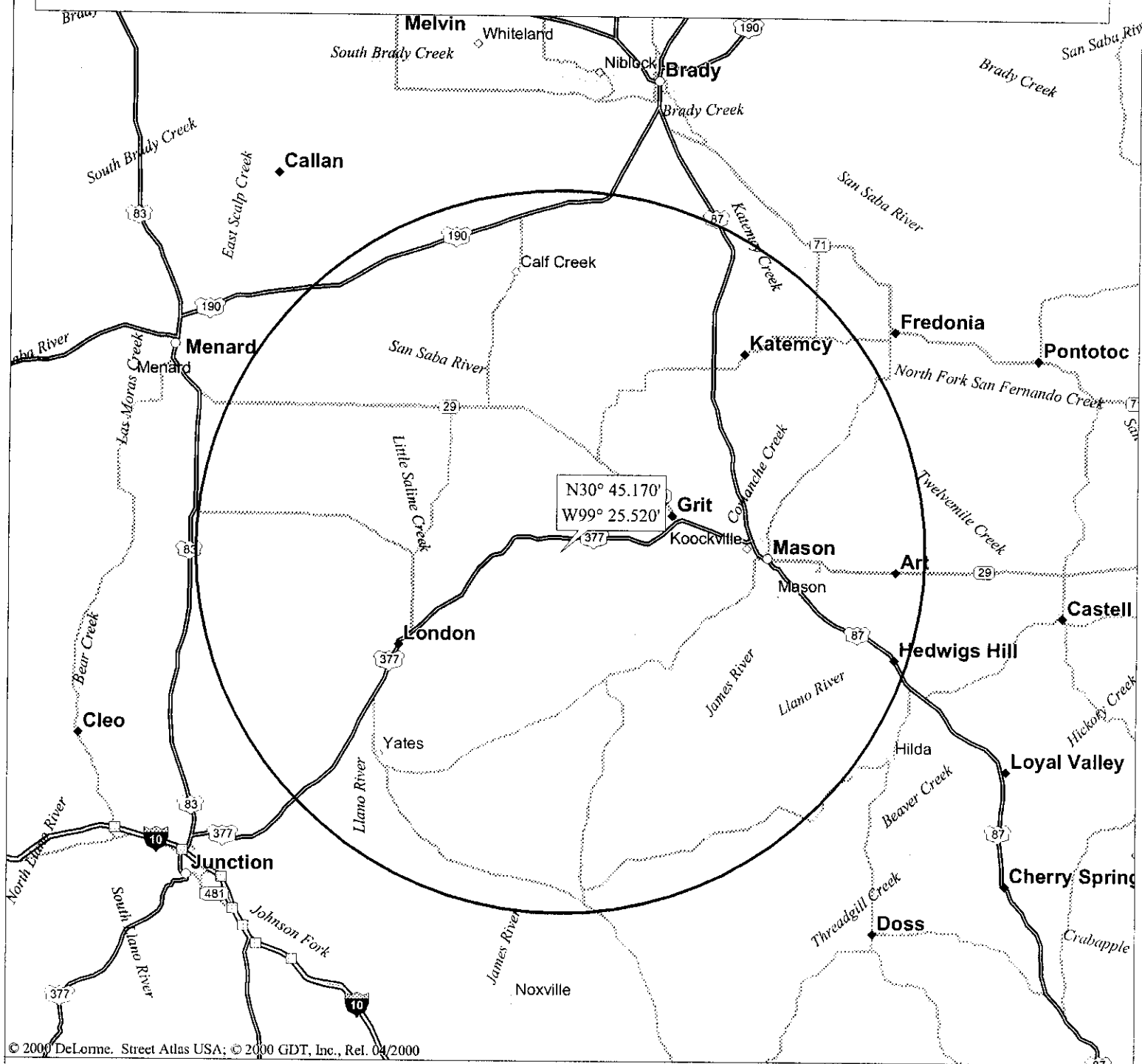
Note: 284A/ Harper which shows being short by -7.34 km is of no consequence as this channel was dismissed by the FCC on August 8, 2003.

FM PROSP^(TM) LOCATE STUDY CH 281 C2 104.1 MHz



Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
ALLO.V	281C2	VAC	Mason	TX	18.68	91.4	190.0	-171.32
RDEL	281C2	DEL	Mason	TX	18.68	91.4	190.0	-171.32
RADD	281C2	ADD	Mason	TX	38.97	85.0	190.0	-151.03
ALLO.V	284A	VAC	Junction	TX	44.93	226.1	55.0	-10.01
RDEL	284A	DEL	Junction	TX	44.93	226.1	55.0	-10.07
RADD	284A	ADD	Harper	TX	47.66	175.5	55.0	-7.34
ALLO.	280C		Ciudad Acuna	CI	214.75	222.8	215.0	-0.25
ALLO.V	282A	VAC	Santa Anna	TX	105.79	4.4	106.0	-0.21
RADD	282A	ADD	Early	TX	112.39	18.6	106.0	6.39
KWTR.C	281C1	CP	Big Lake	TX	231.83	295.8	224.0	7.83
KMFR	281C1	LIC	Pearsall	TX	234.16	164.0	224.0	10.16
ALLO.V	283A	VAC	Eden	TX	65.26	322.5	55.0	10.26
RADD	280A	ADD	Goldthwaite	TX	118.25	45.7	106.0	12.25
KBLT	282A	LIC	N Leakey	TX	123.36	197.7	106.0	17.36
KBLT.C	282A	CP	N Leakey	TX	123.36	197.7	106.0	17.36
RADD	279A	ADD	Hunt	TX	74.27	184.0	55.0	19.27
RADD	279A	ADD	Hunt	TX	76.11	182.2	55.0	21.11
KWTR	281A	LIC	Big Lake	TX	200.79	284.8	166.0	34.79
RADD	280A	ADD	Comanche	TX	142.01	34.8	106.0	36.01
KWOW	281C2	LIC	N Clifton	TX	228.08	60.8	190.0	38.08
RDEL	280A	DEL	Comanche	TX	149.07	31.3	106.0	43.07
ALLO.V	280A	VAC	Comanche	TX	149.07	31.3	106.0	43.07
KOOK	228C2	LIC	Junction	TX	65.15	243.7	20.0	45.15
RDEL	278C	DEL	San Marcos	TX	167.91	117.6	105.0	62.91
RDEL	278C	DEL	San Marcos	TX	167.91	117.6	105.0	62.91
RDEL	278C	DEL	San Marcos	TX	167.91	117.6	105.0	62.91
KEYIFM	278C*	LIC	San Marcos	TX	167.91	117.6	105.0	62.91
RADD	278A	ADD	Brownwood	TX	121.87	22.9	55.0	66.87

Mason, TX CH 281C2 3.16 mv



© 2000 DeLorme. Street Atlas USA; © 2000 GDT, Inc., Rel. 04/2000

Mag 10.00

Mon Aug 11 19:26 2003

Scale 1:500,000 (at center)

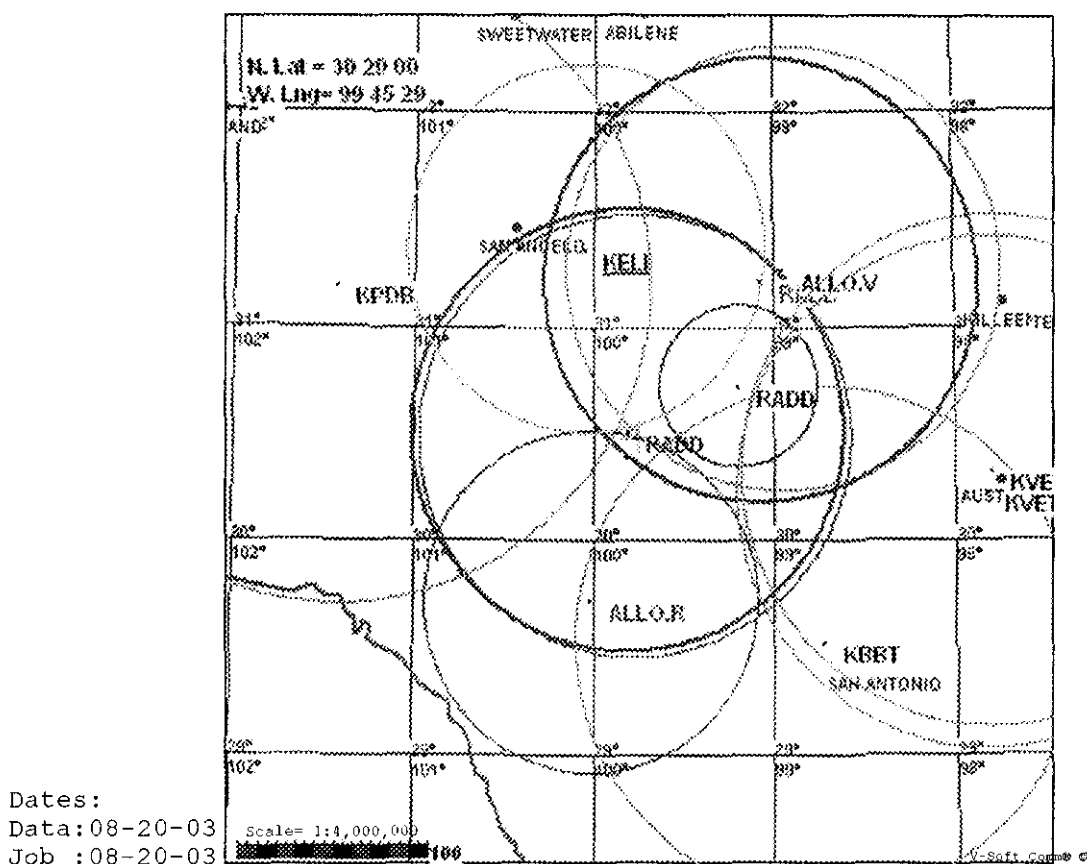
10 Miles

10 KM

- | | | | |
|--|---------------------------|--|--------------------|
| | Local Road | | Locale |
| | US Highway | | Water |
| | Interstate/Limited Access | | River/Canal |
| | Major Connector | | Intermittent River |
| | State Route | | |
| | Exit | | |
| | County Seat | | |
| | Small Town | | |

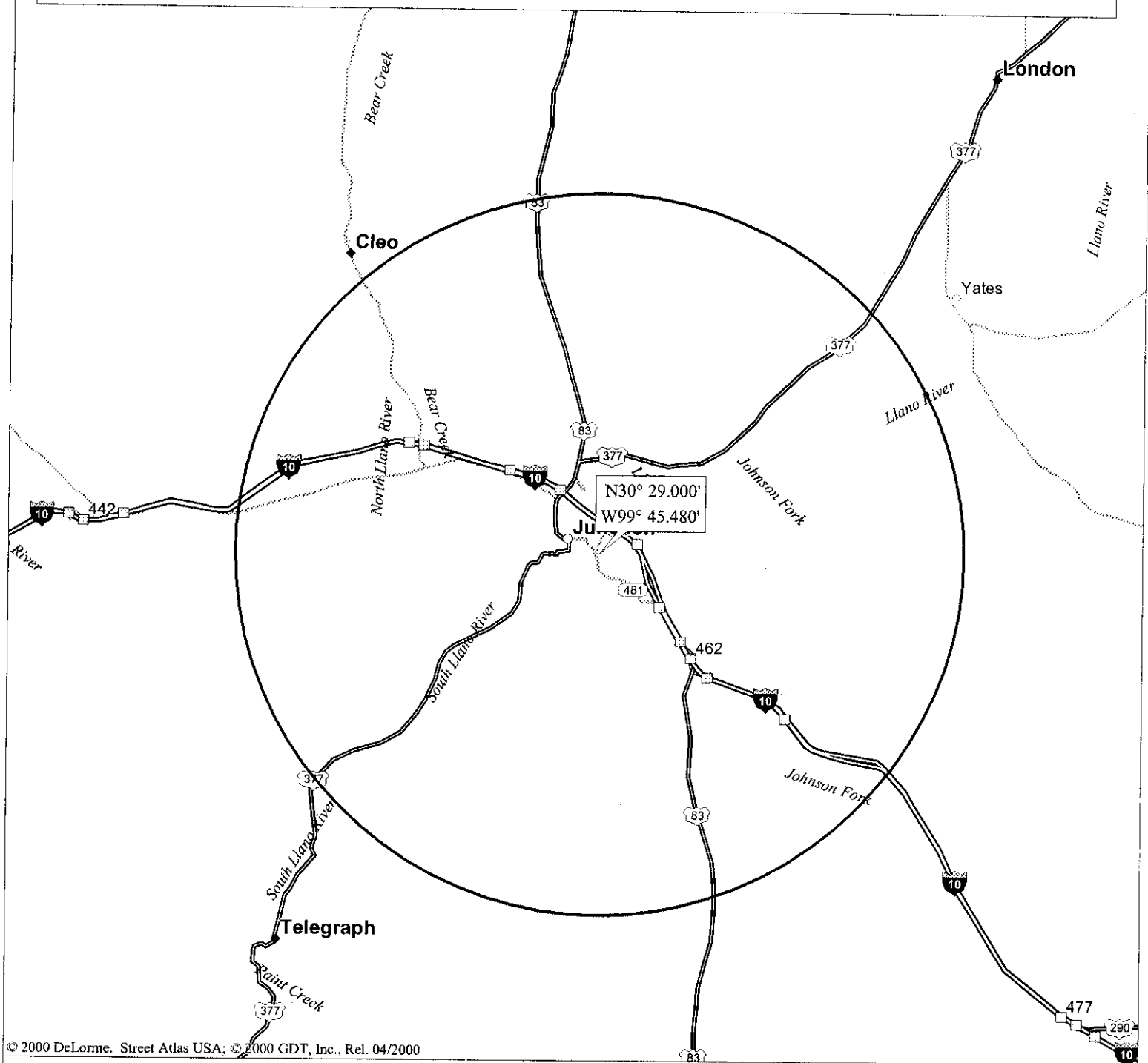
Attachment F
(Channel Study for Channel 252A Junction, Texas)

Note: 252A/ Rochelle which shows being short by -10.52 km is of no consequence as the dismissal for this channel was filed on July 9, 2003.



Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
RDEL	252A	DEL	Junction	TX	1.46	296.4	115.0	-113.54
RADD	252A	ADD	Junction	TX	6.38	305.9	115.0	-108.62
RADD	252A	ADD	Rochelle	TX	104.48	38.8	115.0	-10.52
ALLO.R	251C3	RSV	Camp Wood	TX	88.74	196.2	89.0	-0.26
RDEL	252A	DEL	Richland Springs	TX	116.81	41.4	115.0	1.81
ALLO.V	252A	VAC	Richland Springs	TX	116.81	41.4	115.0	1.81
KELI	254C*	LIC	San Angelo	TX	101.77	344.4	95.0	6.77
KPDB	252C2	LIC	Big Lake	TX	178.20	296.9	166.0	12.20
KBBT	253C1	LIC	Schertz	TX	145.87	136.7	133.0	12.87
RADD	249C3	ADD	Mason	TX	60.23	63.0	42.0	18.23
KVETFM	251C1	LIC	Austin	TX	187.84	98.4	133.0	54.84
KVETFM	251C1	LIC	N Austin	TX	189.05	94.9	133.0	56.05

Junction, TX CH 252A 3.16 mv



© 2000 DeLorme. Street Atlas USA; © 2000 GDT, Inc., Rel. 04/2000

Mag 11.00

Mon Aug 11 19:28 2003

Scale 1:250,000 (at center)

5 Miles

5 KM

- | | | | |
|--|---------------------------|--|--------------------|
| | Local Road | | Locale |
| | US Highway | | Water |
| | Interstate/Limited Access | | River/Canal |
| | Major Connector | | Intermittent River |
| | State Route | | |
| | Exit | | |
| | County Seat | | |
| | Small Town | | |

CERTIFICATE OF SERVICE


I, Joe Garcia, do hereby certify that I have on this 21st day of August, 2003, caused to be mailed by first class mail, postage prepaid, copies of the foregoing **"Counterproposal"** to the following:

Sharon P. McDonald
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Robert Fabian
4 Hickory Crossing Lane
Argyle, TX 76226
(Petitioner)

Munbilla Broadcasting Properties, LTD.
Highway 2147, suite 112
P.O. Box 8715
Horseshoe Bay, TX 78657
(Licensee of KBEY)

Equicom, Inc.
1200 Briarcrest, Suite 4000
Bryan, TX 77802
(Licensee of KXCS)

A large, stylized handwritten signature in black ink, appearing to read 'Joe Garcia', is written over a horizontal line.

Joe Garcia
VP Elgin FM Limited Partnership
7524 North Lamar, Suite 200
Austin, Texas 78752
(512) 453-1491 (tele)
(512) 458-0700 (fax)